

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

**JOHN H. WILLIAMS, JR.
DEANNA L. WILLIAMS,**

DEBTORS.

**Case No.: BK-15-13717-JDL
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTORS

Comes now the secured creditor, Ocwen Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for Mortgage Stanley ABS Capital I Inc. Trust 2004-NC6 Mortgage Pass-Through Certificates, Series 2004-NC6, by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, Ocwen Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for Mortgage Stanley ABS Capital I Inc. Trust 2004-NC6 Mortgage Pass-Through Certificates, Series 2004-NC6 would show the Court as follows:

1. Ocwen Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for Mortgage Stanley ABS Capital I Inc. Trust 2004-NC6 Mortgage Pass-Through Certificates, Series 2004-NC6 is the holder of a purchase money note and mortgage on the real property, ("mortgaged property") of Debtors located at 3320 Norcrest Drive, Oklahoma City, Ok 73121. Said note and mortgage has an estimated outstanding balance of \$247,302.44 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtors reflects an arrearage amount of \$38,000.00. Ocwen Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for Mortgage Stanley ABS Capital I Inc. Trust 2004-NC6 Mortgage Pass-Through Certificates, Series 2004-NC6 disputes this amount and would propose that the correct arrearage

amount is \$40,775.23.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Ocwen Loan Servicing, LLC, as servicer for Deutsche Bank National Trust Company, as Trustee for Mortgage Stanley ABS Capital I Inc. Trust 2004-NC6 Mortgage Pass-Through Certificates, Series 2004-NC6, moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate protection or such other and further relief as may be entitled.

OCWEN LOAN SERVICING, LLC, AS
SERVICER FOR DEUTSCHE BANK
NATIONAL TRUST COMPANY, AS
TRUSTEE FOR MORTGAGE STANLEY ABS
CAPITAL I INC. TRUST 2004-NC6
MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2004-NC6,

By: s/ Jim Timberlake
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on November 10, 2015.

John H. Williams, Jr.
Deanna L. Williams
3320 Norcrest Drive
Oklahoma City, OK 73121

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman
P.O. Box 1948
Oklahoma City, OK 73101

Gabriel Rivera
PO Box 7837
Moore, OK 73153-1837

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